

# Exhibit 4

MARGARET A. FISCHER  
FISCHER V. GEICO

December 19, 2024  
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Page 1		Page 3
1	UNITED STATES DISTRICT COURT	1 APPEARANCES:
2	EASTERN DISTRICT OF NEW YORK	2
	-----X	3 OUTTEN & GOLDEN, LLP
3	KEITH FISCHER, MICHAEL O'SULLIVAN,	4 Attorney for Plaintiffs
	JOHN MOESER, LOUIS PIA, THOMAS	4 685 Third Avenue, 25th Floor,
4	BARDEN, CONSTANCE MANGAN, and	5 New York, New York 10017
	CHARISE JONES, individually and on behalf	5 (212) 245-1000
5	of all others similarly situated,	6 BY: SABINE JEAN, ESQ.
6	Plaintiffs,	6 Sjean@outtengolden.com
7	Case No.:	7 ZARKA DSOUZA, ESQ.
	2:23 Civ. 2848	7 zdesouza@outtengolden.com
8	(GRB) (ARL)	8
	-against-	9
9	GOVERNMENT EMPLOYEES INSURANCE	10 DUANE MORRIS, LLP
10	COMPANY D/B/A GEICO,	11 Attorney for Defendant
11	Defendants.	11 1540 Broadway, 14th Floor,
	-----X	12 New York, New York 10036
12		12 (212) 471-1856
13		13 BY: GREG TSONIS, ESQ.
	DEPOSITION of MARGARET A. FISCHER	13 Gtsonis@duanemorris.com
14		14
15		15 Gil Peretz, Shereck Video, videographer,
16	December 19, 2024	16
17	New York, New York	17
18		18
19		19
20		20
21		21
22	Reported By:	22
23	Marina Dubson	23
24	Job #: J12144278	24
25		25
Page 2		Page 4
1		1 IT IS HEREBY STIPULATED AND AGREED,
2		2 by and between the attorneys for the
	DATE: December 19, 2024	3 respective parties, as follows:
3		4
	TIME: 10:00 a.m.	5 THAT all objections, except as to the form
4		6 of the questions, shall be reserved to the
5		7 time of the trial;
6	DEPOSITION of MARGARET A. FISCHER, an	8
7	opt-in Plaintiff herein, taken by the	9 THAT the within examination may be signed
8	Defendant, pursuant to Federal Rules of	10 and sworn to before any Notary Public with
9	Civil Procedure, and Notice, held at the	11 the same force and effect as if signed and
10	Duane Morris LLP, 1540 Broadway, 14th	12 sworn to before the Court;
11	Floor, New York, New York 10036, at the	13
12	above-mentioned date and time, before	14 THAT filing of the original transcript of
13	MARINA DUBSON, a Notary Public of the State	15 the examination is waived.
14	of New York.	16
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	Page 173		Page 175
1	M. A. Fischer	1	M. A. Fischer
2	Q. Thank you.	2	Geico local human resources manager?
3	It then continues in the third	3	A. No.
4	sentence: A nonexempt associate who feels	4	Q. You had the ability to contact
5	he/she did not receive pay for all his/her	5	Geico's corporate human resources, right?
6	hours worked and an exempt or salaried	6	A. Yes.
7	nonexempt associate who feels his/her pay	7	Q. You had the ability to contact
8	incorrectly reflects a deduction for an	8	Geico's local human resources manager?
9	absence should contact his or her	9	A. Yes.
10	supervisor, local human resources manager,	10	Q. It also says you could contact
11	or corporate human resources.	11	your supervisor, correct?
12	Did I read that right?	12	A. Yes.
13	A. Yes.	13	Q. Did you ever contact your
14	Q. All right. Did you understand	14	supervisor?
15	that, if you had -- if you felt you didn't	15	A. We discussed overtime in
16	receive pay for all the hours that you	16	meetings just in passing, like, everybody
17	worked, that you could contact your	17	knew every -- you know, when we were
18	supervisor, local human resources manager,	18	working.
19	or corporate human resources?	19	Q. Okay. Let's be more specific
20	A. Yes.	20	about that.
21	Q. All right. Did you also	21	Which supervisor are you
22	understand as a Geico associate that Geico	22	talking about?
23	maintains a Berkshire Hathaway ethics line?	23	A. I don't know. Maybe Danielle.
24	A. Yes.	24	I don't know. But in general, when you
25	Q. What's the purpose of the	25	would have a group meeting, you know, it
	Page 174		Page 176
1	M. A. Fischer	1	M. A. Fischer
2	Berkshire Hathaway ethics line?	2	would -- you know, people were working
3	A. I believe it was to report any	3	more. There was a lot of work to be done.
4	kind of problem that you had.	4	Q. Would you participate in
5	Q. All right. Would that include	5	meetings only with major case or with other
6	a problem of not being compensated for all	6	job titles within SIU?
7	time worked?	7	A. Mainly with major case.
8	A. It could be, yeah.	8	Q. How many meetings would you
9	Q. Okay. Did you ever try to call	9	have?
10	the Berkshire Hathaway line?	10	A. Maybe one a month.
11	A. No.	11	Q. Was everybody present in those
12	Q. You would be able to call the	12	meetings, meaning field, major case, and
13	line if you wanted to, though, right?	13	inside major case?
14	A. Correct.	14	A. No, just my unit.
15	Q. Did you ever try to call	15	Q. Did everybody in your unit --
16	corporate human resources?	16	well, strike that.
17	A. No.	17	I think you said earlier, at a
18	Q. And I'll preface this. I'm	18	certain point they hired 12 new people, and
19	talking about being compensated for time	19	there was a total of about 18?
20	that you're alleging that you worked.	20	A. Yes.
21	Okay?	21	Q. Did those 18 people report to
22	Did you ever try to contact	22	the same supervisor?
23	Geico corporate human resources?	23	A. Two supervisors.
24	A. No.	24	Q. Who was the other supervisor?
25	Q. Did you ever try to contact	25	A. Katherine -- what's

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1	M. A. Fischer	1 M. A. Fischer
2	Katherine's -- Cavallo and Kristin Slack.	2 A. Every few months.
3	Q. Okay. So, you would be a part	3 Q. Okay. During these meetings,
4	of meetings that happened with your peers	4 were there ever concerns about unpaid
5	that reported to Kristin Slack?	5 overtime being raised?
6	A. Yes.	6 A. No.
7	Q. Would you be a part of meetings	7 Q. No investigator you ever heard
8	for your peers that reported to Kristen	8 raised a concern to a supervisor about
9	Cavallo [sic]?	9 unpaid overtime?
10	A. Katherine.	10 A. Not about unpaid overtime.
11	Q. Katherine Cavallo. Apologies.	11 Q. Am I understanding correctly
12	A. Yes, they would put us -- at	12 that some people raised concerns about
13	that point, I believe that it was all	13 having to work overtime?
14	together.	14 A. That we did work overtime.
15	Q. Okay. So, that was, I guess --	15 Q. Okay. What was the concern
16	my question was: Would the two teams have	16 that you raised or that others raised?
17	separate meetings? Or would it be one big	17 A. There was a lot of work that
18	group meeting?	18 had to be done. It takes time to keep
19	A. One big group meeting when it	19 current.
20	was two teams, I believe, best I can	20 Q. Okay. So, was the issue --
21	remember. It wasn't that long.	21 well, strike that.
22	Q. That happened approximately	22 Was it you that raised that
23	once a month -- once a month, you said?	23 issue or others?
24	A. I would think so, yeah.	24 A. Say it again.
25	Q. Where did they take place?	25 Q. Was it you that brought that up
	Page 178	Page 180
1	M. A. Fischer	1 M. A. Fischer
2	A. In one of the conference rooms,	2 and raised that issue? Or was it others?
3	I believe, to the best that I can remember.	3 A. No. It would just be as part
4	Q. Okay. Would people that were	4 of a discussion.
5	assigned out of the New Jersey office	5 Q. So, there would be a discussion
6	participate?	6 about workload generally is what I'm
7	A. No.	7 understanding?
8	Q. What would typically be	8 A. Workload, yes.
9	discussed in these meetings?	9 Q. Okay. So, you and other
10	A. Any changes that were going on,	10 investigators would have discussions with
11	trends that were happening, expectations,	11 the supervisor about your workload
12	any updates, any news, things like that.	12 generally?
13	Q. Would individual investigators,	13 A. Yes.
14	like, present during this meeting? So, I	14 Q. Okay. During the course of
15	guess was it interactive amongst the whole	15 those discussions, you didn't inform your
16	group? Or was it more of a download from	16 supervisor that you were working overtime
17	the supervisors?	17 and not logging it into Workday; is that
18	A. It would -- the supervisor	18 correct?
19	would lead, and then people would add if	19 A. Correct.
20	they're asked for questions.	20 MS. DSOUZA: Objection.
21	Q. Would the SIU manager	21 BY MR. TSONIS:
22	participate in these meetings?	22 Q. And during those discussions,
23	A. Once in a while.	23 your supervisor didn't instruct you to work
24	Q. If you had to estimate, how	24 overtime and not log it into Workday,
25	frequently?	25 correct?

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Page 297			Page 299		
1	M. A. Fischer		1	M. A. Fischer	
2	E X H I B I T S		2	C E R T I F I C A T E	
3			3		
4	DEFENDANT EXHIBITS		4	STATE OF NEW YORK )	
5			5	COUNTY OF RICHMOND )	
6	EXHIBIT	EXHIBIT	6		
7	NUMBER	DESCRIPTION	7	I, MARINA DUBSON, a Notary Public for	
8	1	interrogatories	79	and within the STATE OF NEW YORK, do hereby	
9	2	Workday profile	153	certify:	
10	3	human resources	167	That the witness whose examination is	
11		associate handbook		hereinbefore set forth was duly sworn and	
12	4	Excel spreadsheet	200	that such examination is a true record of	
13	5	2017 self-appraisal	213	the testimony given by that witness.	
14	6	Excel spreadsheet	227	I further certify that I am not	
15	7	the operative complaint	233	related to any of the parties to this	
16	8	interrogatories	258	action by blood or by marriage and that I	
17	9	e-mail chain	270	am in no way interested in the outcome of	
18				this matter.	
19				IN WITNESS WHEREOF, I have hereunto	
20		(*Exhibits attached to transcript.)		set my hand this 19th day of December 2024.	
21					
22		(Cont'd next page.)			
23					
24					
25					
Page 298			Page 300		
1	M. A. Fischer		1	ERRATA SHEET	
2	I N D E X		2	WITNESS NAME: MARGARET. A FISCHER	
3			3	PAGE LINE (s) CHANGE REASON	
4	EXAMINATION BY	PAGE	4	_____   _____   _____   _____	
5	MR. TSONIS	7, 287	5	_____   _____   _____   _____	
6	MS. DSOUZA	282	6	_____   _____   _____   _____	
7			7	_____   _____   _____   _____	
8			8	_____   _____   _____   _____	
9	INFORMATION AND/OR DOCUMENTS REQUESTED		9	_____   _____   _____   _____	
10	INFORMATION AND/OR DOCUMENTS	PAGE	10	_____   _____   _____   _____	
11	BY MR. TSONIS:		11	_____   _____   _____   _____	
12	1. Request to preserve notes	42	12	_____   _____   _____   _____	
13	2. Request for notes	43	13	_____   _____   _____   _____	
14	BY MS. DSOUZA:		14	_____   _____   _____   _____	
15	3. Request for e-mails	292	15	_____   _____   _____   _____	
16	4. Request for swipe card activity	293	16	_____   _____   _____   _____	
17	as well as SICM data		17	_____   _____   _____   _____	
18	5. Request for yearly goals	293	18	_____   _____   _____   _____	
19			19	_____   _____   _____   _____	
20			20	_____   _____   _____   _____	
21			21		
22			22	-----	
23	QUESTIONS MARKED FOR RULINGS		23	MARGARET. A FISCHER	
24	PAGE LINE QUESTION		24	SUBSCRIBED AND SWORN BEFORE ME	
25	(None)		25	THIS ____ DAY OF _____, 20___. (NOTARY PUBLIC) MY COMMISSION EXPIRES:	